

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

BANCO ITAÚ EUROPA LUXEMBOURG  
S.A., and BANCO ITAÚ EUROPA  
INTERNATIONAL,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01019 (CGM)

**STIPULATION AND ORDER TO ADJOURN ARGUMENT DATE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*lll*, and the estate of Bernard L. Madoff, individually, and defendants Itaú BBA International (Cayman) Ltd., f/k/a Itaú Europa Luxembourg, S.A., f/k/a Banco Itaú Europa Luxembourg S.A. and Banco Itaú Europa International (“Defendants”), by and through their respective, undersigned counsel, hereby stipulate and agree as follows:

**WHEREAS**, on January 26, 2022, the Court entered a stipulation and order that set a briefing schedule for Defendants' motion to dismiss the Trustee's Complaint (the "Motion"), ECF No. 113;

**WHEREAS**, on March 14, 2022, Defendants filed the Motion, ECF Nos. 117–119, and on May 13, 2022, the Trustee opposed the Motion, ECF Nos. 120–121;

**WHEREAS**, on June 1, 2022, the Court entered a stipulation and order amending the briefing schedule to allow Defendants to file their reply by June 27, 2022, and adjourning the hearing to consider Defendants' Motion to August 10, 2022, ECF No. 123;

**WHEREAS**, on June 27, 2022, Defendants filed their reply, ECF Nos. 124–125;

**WHEREAS**, the parties have since agreed to request that the hearing on the Motion be adjourned from August 10, 2022 to October 19, 2022, at 10:00 a.m.;

**IT IS HEREBY STIPULATED AND AGREED**, by and between the parties, and **SO ORDERED**, by the Court that the hearing on Defendants' Motion be adjourned from August 10, 2022, to October 19, 2022, at 10:00 a.m. (prevailing Eastern time).

*[Remainder of page intentionally left blank.]*

Dated: July 19, 2022  
New York, New York

**BAKER & HOSTETLER LLP**

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*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7  
Estate of Bernard L. Madoff*

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S.A., f/k/a Banco Itaú Europa Luxembourg S.A.,  
and Banco Itaú Europa International*

**Dated: July 20, 2022**  
**Poughkeepsie, New York**



**/s/ Cecelia G. Morris**

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**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**